



SECRETARIA DE AGRICULTURA,
GANADERIA, DESARROLLO RURAL,
PESCA Y ALIMENTACION

**AGRICULTURAL OFFICE
EMBASSY OF MEXICO**

Washington, DC, March 23, 2004.

**Mr. A. J. Yates
Administrator
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave, SW
Room 1661, South Building STOP 0240
Washington, DC 20250-0240**

**Attn: Standardization Section, Fresh Products Branch
Fruit and Vegetable Programs**

Via Email (FPBDocketClerk@usd.gov)

Re: U.S. Standards for Grades of Greenhouse Tomatoes (Docket Number FV-04-301P)

Dear Mr. Yates:

These comments are submitted on behalf of Mexico's Secretaria de Agricultura, Ganaderia, Desarrollo Rural, Pesca y Alimentacion ("SAGARPA") in response to the request for public comments on the proposed modification of official grade standards for greenhouse tomatoes. 68 *Fed. Reg.* 68859 (December 10, 2003). SAGARPA supports the efforts of the U.S. Department of Agriculture to modernize the U.S. standards for grades of greenhouse tomatoes, and in particular the classification of defects by count instead of by weight.

SAGARPA supports the move from calculated percentage of defects based on the weight of each tomato in the lot with a defect to a system based on the count of tomatoes within the lot with the defect. SAGARPA agrees that this change would significantly speed the inspection process for greenhouse tomatoes without affecting the integrity of the inspection process.

SAGARPA, however, is concerned over the proposal to use diameters as the method to determine size for the grade standard. Variations in varieties of greenhouse tomatoes produce tomatoes that are relatively taller and thinner as well as some varieties that are shorter and wider. The industry is relatively standardized in using a one-layer pack that is around 15 pounds net weight for beefsteak tomatoes that uses a count methodology to define size. SAGARPA suggests that the



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USDA investigate the possibility of using a count size as a basis for determining size, since measuring diameters would slow the process of inspections (possibly offsetting any gains obtained from classifying defects by count instead of weight), and might lead to even less standardization within the industry regarding size than exists today.

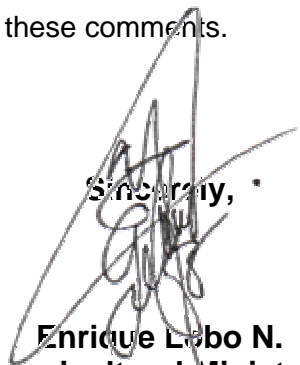
SAGAPRA would also request USDA to reexamine destination tolerances during its modernization of the grade standard. Given that greenhouse tomatoes are still ultimately perishable vegetables, USDA should investigate if time and distance to the delivery point from the shipping point should be similar to those for virtually all other fruit and vegetable standards enforced by USDA.

SAGARPA opposes any effort to use the grade standard as the vehicle to define the greenhouse industry. The revisions to the standard needs to focus on the product itself and in helping the trade communicate the quality and condition of greenhouse tomatoes in a more uniform manner.

SAGARPA would also urge that the revised standard not be written in such a way to discourage the innovative use of packaging in marketing greenhouse tomatoes. Just as production technology has changed over the years, so have consumer and retailer demands for new styles of presentation and packaging. Grades should not be limited to a specified number of box dimensions or pack styles.

Thank you for your consideration of these comments.

Sincerely, *



**Enrique Lobo N.
Agricultural Minister
Embassy of Mexico**